

Exhibit 2

10 Monday, May 13, 2019

12 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

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1 McKesson decided not to ship any more
2 controlled substances, that would -- you
3 know, there would be no diversion, so it's
4 just a hypothetical that --

5 BY MR. EPPICH:

6 Q. Yes, and you're an expert in
7 this case, sir.

8 A. I don't have an opinion.

9 Q. So hypothetically, if there is
10 a suspicious order monitoring program --

11 A. Okay.

12 Q. -- that reports a suspicious
13 order -- or excuse me, that does not block --
14 let me strike that.

15 If there is a suspicious order
16 monitoring program that does not report
17 suspicious orders but blocks suspicious
18 orders, that program can be effective in
19 preventing diversion?

20 A. So the mere act of doing that
21 is in violation of the regulation, but the
22 outcome of blocking the order would obviously
23 keep it from being distributed and it would
24 not lead to diversion.

25 Q. Blocking the order of the

1 opioid pills before shipment is what prevents
2 diversion from occurring, correct?

3 A. Yes, sir.

4 MR. FULLER: Form.

5 BY MR. EPPICH:

6 Q. Not the reporting of the
7 suspicious order to DEA, correct?

8 A. But we were discussing the
9 regulatory requirement, so it's to design and
10 operate a system to disclose suspicious
11 orders, and upon disclosure, be reported to
12 the DEA. Under the maintenance of effective
13 controls, it's to stop the shipment.

14 Now, just the mere fact of
15 stopping a shipment when you've identified it
16 as a potential suspicious order would prevent
17 diversion.

18 Q. My question was a little
19 different, and so let me rephrase it.

20 You'd agree that not reporting
21 the suspicious order to DEA is not what
22 causes diversion?

23 A. That's correct.

24 MR. FULLER: Object to form.

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